

The Honorable Lauren King

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF WILLIAM  
MCGINTY IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
CONTEMPT, SHORTENED TIME,  
AND ATTORNEYS' FEES

NOTE ON MOTION CALENDAR:  
Friday, March 14, 2025

ORAL ARGUMENT REQUESTED

I, William McGinty, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am one of the attorneys representing Plaintiff State of Washington in the above-captioned matter.

2. Attached as Exhibit 1 is a true and correct copy of Defendants' Status Report, Dkt. #70 and Dkt. #70-1 filed in *PFLAG, Inc. v. Trump*, No. 8:25-cv-00337-BAH (D. Md. 2025).

3. Attached as Exhibit 2 is a true and correct copy of a social media post on X, formerly known as Twitter, posted by the Department of Government Efficiency (@DOGE) on February 28, 2025. I accessed this post online at the URL, [https://x.com/doge/status/1895645518912795109?s=51&t=rPzNVmthVrpJa\\_h18-NUJg](https://x.com/doge/status/1895645518912795109?s=51&t=rPzNVmthVrpJa_h18-NUJg) on

1 March 5, 2025 and used the print feature on the website to save a PDF copy using a print to PDF  
2 function.

3 4. Attached as Exhibit 3 is a true and correct copy of email communications between  
4 Plaintiffs' counsel and counsel for Defendants with dates between March 3, 2025, and March 6,  
5 2025. Included as an attachment to the initial email was a true and correct copy of a letter sent  
6 to Seattle Children's Hospital terminating research dated February 28, 2025, and which appears  
7 as Exhibit A to the Declaration of Dr. Kym Ahrens. Included as an attachment to the email of  
8 March 6, 2025, from Colleen Melody was a true and correct copy of a second letter to Seattle  
9 Children's Hospital terminating research dated March 4, 2025, and which appears as Exhibit B  
10 to the Declaration of Dr. Kym Ahrens.

11 5. Attached as Exhibit 4 is a true and correct copy of email communications between  
12 Plaintiffs' counsel and counsel for Defendants with dates between March 3, 2025, and March 6,  
13 2025. It is largely duplicative of the email thread reproduced in Exhibit 3, except for the March  
14 6, 2025, email from Vinita Andrapalliyal, which is at the top of the thread.

15 6. Attached as Exhibit 5 is a true and correct copy of a news article published in  
16 Nature on March 6, 2025, written by Max Kozloy and Smriti Mallapaty titled "Exclusive: NIH  
17 to terminate hundreds of active research grants." I accessed this article online at the URL  
18 <https://www.nature.com/articles/d41586-025-00703-1> on March 5, 2025 and used the print  
19 feature on the website to save a PDF copy using a print to PDF function.

20 7. Attached as Exhibit 6 is a true and correct copy of a chart received by  
21 Physician Plaintiff 1 from a colleague. Physician Plaintiff 1 understands the chart to be a tool  
22 NIH may be using to determine whether it will continue to fund grants in light of the Gender-  
23 Ideology Order, Exec. Order No. 14,168, which the chart explicitly references.

24 8. Attached as Exhibit 7 is a true and correct copy of the Memorandum and Order,  
25 Dkt. #161, issued by United States District Court for the District of Rhode Island in *New York*  
26 *v. Trump*, No. 1:25-cv-00039-JJM-PAS on March 6, 2025.

9. Attached as Exhibit 8 is a true and correct copy of a letter from the Health Resources and Services Administration (HRSA) dated March 6, 2025, signed by Thomas J. Engels. It details efforts by HRSA to defund the “chemical and surgical mutilation” of children by “re-scoping, delaying, or potentially cancelling” grants made as part of its Children’s Hospitals Graduate Medical Education Payment Program. The website [https://taggs.hhs.gov/Detail/CFDADetail?arg\\_CFDA\\_NUM=93255](https://taggs.hhs.gov/Detail/CFDADetail?arg_CFDA_NUM=93255) includes information about this program including the institutions receiving such funds and the states where they are located. In fiscal year 2024, according to the above linked website, five institutions in the Plaintiff States received these funds including Seattle Children’s Hospital and Multicare Health System in Washington, Gillette Children’s Specialty Healthcare and Children’s Health Care in Minnesota, and Children’s Hospital Colorado in Colorado. Plaintiffs are still investigating to determine which institutions in the Plaintiff States were specifically sent this letter by HRSA, but are aware that it was at least emailed to Children’s Minnesota and Seattle Children’s Hospital.

10. Attached as Exhibit 9 is a true and correct copy of a letter from the Substance Abuse and Mental Health Services Administration dated March 6, 2025, and signed by Christopher D. Carroll. Plaintiffs are still investigating which agencies and health care institutions in the Plaintiff States received this letter but are aware that it was sent to the Minnesota Department of Health.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 6th day of March 2025 at Olympia, Washington.

/s/ William McGinty

WILLIAM MCGINTY, WSBA #41868  
Assistant Attorney General